

FILED
U.S. BANKRUPTCY COURT

March 28th, 2025

Judge Sean H. Lane
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4140

2025 MAR 31 A 11:08

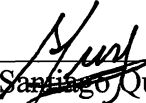
S.D. OF N.Y.

**Re: *In re Santiago Quezada, Sr.* - Chapter 11 Bankruptcy Subchapter V
Case No. 24-22431-SHL**

Your Honor,

As I recently informed the Court in an affidavit, on Wednesday, March 19th, 2025, I informed my bankruptcy attorney that she was discharged and would no longer represent me. It is my understanding that the Court decided in an Order to deny my objection to the claim by Creditor Maria Jose Pizarro, and to grant her cross-motion to file said claim after the claims bar date. This order was dated and entered on March 17th, 2025. In addition to obtaining new legal counsel to represent me, I also would like to preserve my right to appeal this Order. Therefore, I write to ask this Court to toll or otherwise extend my time to file my notice of appeal on this issue.

Very truly yours,


Santiago Quezada, Sr.

Pro Se

MEMORANDUM ENDORSED ORDER:

The Court construes this letter as a request for the Court to docket the attached documents as an appeal of the Court's Order of March 17, 2025 and related bench ruling of March 31, 2025. *See* ECF Nos. 55 and 65. Given the pending motion to withdraw as Debtor's counsel by Ms. Ortiz [ECF No. 58] and the Debtor's statement in this letter that he has discharged Ms. Ortiz as counsel in the bankruptcy case, the Court will direct the Clerk's Office to file this letter and the attached documents as a notice of appeal.

SO ORDERED.

Dated: March 31, 2025

/s/ Sean H. Lane

UNITED STATES BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re :
SANTIAGO QUEZADA SR., :
Debtor. :
-----X

FILED
U.S. BANKRUPTCY COURT

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S.D. OF N.Y.

Case No. 24-22431

Chapter 11 Sub-Chapter V

NOTICE OF APPEAL TO THE U.S. ^{Bankruptcy} DISTRICT COURT

AR

I, Santiago Quezada Sr., the above-captioned debtor in possession, appeals to the U.S. District Court, for the Southern District of New York from the order (the "Order") of the U.S. Bankruptcy Court [Ecf. No. 55] entered in this case on March 17, 2025, that denied my objection to the Proof of Claim filed by Maria Pizarro on December 9, 2024. [Ecf. No. 31].

The parties to the Order appealed from and the names and addresses of their respective attorneys are as follows:

Ms. Maria Pizarro
c/o Evan Brustein, Esq.
Brustein Law PLLC
299 Broadway, 17th Floor
New York, NY 10007

Jeffrey Chubak, Esq.
Amini LLC
131 West 35th Street, 12th Floor
New York, NY 10001

Dated: March 31, 2025

Yonkers, New York

By: /s/ Santiago Quezada, Sr.
Santiago Quezada Sr.

[Caption as in Form 416A, 416B, or 416D, as appropriate]

NOTICE OF APPEAL AND STATEMENT OF ELECTION

Part 1: Identify the appellant(s)

1. Name(s) of appellant(s):
SANTIAGO QUEZADA, SR.
2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in an adversary proceeding.

- ☐ Plaintiff
☐ Defendant
☐ Other (describe) _____

For appeals in a bankruptcy case and not in an adversary proceeding.

- ☒ Debtor
☐ Creditor
☐ Trustee
☐ Other (describe) _____

Part 2: Identify the subject of this appeal

1. Describe the judgment—or the appealable order or decree—from which the appeal is taken:
Order finding claim by Creditor Maria Jose Pizarro was timely filed. Order denying my objection to the Proof of Claim filed by Maria Jose Pizarro.
2. State the date on which the judgment—or the appealable order or decree—was entered:
March 17th, 2025

Part 3: Identify the other parties to the appeal

List the names of all parties to the judgment—or the appealable order or decree—from which the appeal is taken and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):


1. Party: Maria Jose Pizarro Attorney: Jeffrey Chubak, Esq.
Amini LLC
131 W. 35th Street, 12th Floor
New York, NY 10001
(212) 490-4700
2. Party: Maria Jose Pizarro Attorney: c/o Evan Brustein, Esq.
Brustein Law PLL
299 Broadway, 17th Floor, New York, NY 10007
(212) 233-3900

Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

- ☐ Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

Part 5: Sign below



Signature of attorney for appellant(s) (or appellant(s)
if not represented by an attorney)

Date: 3/28/25

Name, address, and telephone number of attorney
(or appellant(s) if not represented by an attorney):

Santiago Quezada, Sr.
252 Runsey Road
Yonkers, NY 10705
914 - 462 - 8873

Fee waiver notice: If appellant is a child support creditor or its representative and appellant has filed the form specified in § 304(g) of the Bankruptcy Reform Act of 1994, no fee is required.

[Note to inmate filers: If you are an inmate filer in an institution and you seek the timing benefit of Fed. R. Bankr. P. 8002(c)(1), complete Director's Form 4170 (Declaration of Inmate Filing) and file that declaration along with the Notice of Appeal.]